

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA                     )  
  )  
                          v.                     ) Criminal No. 04-50 Erie  
  )  
JOHN JOSEPH PRICE, JR.                     )

**GOVERNMENT'S MOTION TO CONTINUE SUPPRESSION HEARING**

AND NOW comes the United States of America, by and through its counsel, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Christian A. Trabold Assistant United States Attorney for said district, and states as follows:

1. A suppression hearing has been scheduled for this case on February 16, 2006 at 1:30 p.m.

2. Agent Randall Schirra, one of the agents involved in the case, is not available to testify at the suppression hearing due to a medical appointment that can not be rescheduled. Agent Schirra's testimony in the instant case is critical to the government.

3. Trooper Ron Wilson, the other agent involved in the case, will be unavailable to testify between February 19<sup>th</sup> and February 26<sup>th</sup>, 2006 due to a scheduled out of town vacation.

4. Defense counsel has no objection to continuing Price's suppression hearing.

WHEREFORE, the government respectfully requests that the suppression hearing of John Joseph Price, Jr. be continued so that Agent Schirra and Trooper Wilson can be available to testify.

Respectfully submitted,

MARY BETH BUCHANAN  
United States Attorney

s/Christian A. Trabold  
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